

MCKin

Meeting in st paul, mpca polymet

Tuesday, September 25, 2018 12:40 PM

Polymet - christie Kearney, Don Richards (Barr), Dennis Donohue (Warner Norcross – counsel)

Mpca - udd, smith, schmidt, handeland, clark, Scott Kyser, Brian Schweiss

Polymet starts

1. Background

- General overview of where we are at in the permit process
 - Mpca - has been working on responses to comments. Building record.

2. Discussion

- Treatment technology design and operation (PolyMet)
 - How does it work
 - Expected water quality at discharge
 - Polymet gives powerpoint presentation
 - Wfd: iron pretreat, greensand, primary RO/NF, lime contactor, degas
 - Large range of influent parameter concentrations. (orders of mag)
- Limits development and monitoring (EPA, MPCA)
 - Water quality and technology approach
- Permit enforceability (EPA)
 - General concerns
 - mpca has added language, that they are proposing, to the permit that will improve the aspects of our concerns that relate to decision making.
 - They might not address bringing facility back into
- Decision making process and permit modification (EPA, MPCA)
 - Adaptive management
 - Process used for future changes
- Permitting approach to legacy issues (MPCA, PolyMet)
 - How will this work?
- Other (All)

Meeting in st paul with mpca

Wednesday, September 26, 2018 8:15 AM

Recap of yesterday

No movement on either mpca or epa's part

Mpca walks through changes:

Modified "no discharge" language. (change - no direct discharge....)

Hrf - no discharge to ground or surface waters

Monitoring locations - added bedrock monitoring well at tb. Additional sw monitoring along transpo corridor. Relocated another monitoring well.

Added limit for WET in permit. TUC 1.0. quarterly.

Mercury minimization plan added

Added language - construction as proposed in the oct 2017 application. Certification from PE that liner design meets spec. maintenance manual for each control. (not submitted).

Submittal of as-builts.

Seepage capture systems - maintain inward gradient. If outward gradient found, increase monitoring, eliminate outward gradient. Need to investigate cause. Get 7 days to re-establish inward gradient.

Added language - prohibits addition of aluminum.

Some cases - reduced notification times.

Adaptive management - added language specified that any proposed adaptive management is subject to review and approval. Any proposed adaptive management is subject to ...permit mod and PN.

Eq basins - mine site - constructed as industrial ww ponds. Ponds are part of performance evaluations.

Existing and proposed monitoring network for HRF... evaluation deferred until the HRF is designed.

Added dissolved mercury monitoring at infl and effl to treatment system.

NOT changed:

Allowable discharge (flow)

Sd001 - not necessary.... Dilution.... Sewage system effluent

Linda asks why mpca didn't find rp. Jeff explains that based on pilot study and treatment that was chosen. Controlling system for sulfate, means that other metals and things would go along with it. Asks about reponer. Mpca has reopener in rules.

Federal enforceability of the internal monitoring location - mpca understands that epa couldn't put it in, but according to mpca epa/citizen could enforce any condition of a permit. Case law is mixed on this.

Mpca seems to agree that they could add narrative statement on prohibition of discharge violating wqs.

Mark makes points about caveats in the pilot study reports from vendors saying that pilot study performance is not guaranteed in full scale.

Kevin asks if mpca would add more parameters for internal outfall limits.

Influent predicted to be higher than wqs.

As

Co

Cu

Pb

Ni

Hardness

sulfate

Migration from mine pit question: monitoring. Annual report. Migration will be evaluated.

Schedule: 3rd week in october for dnr to issue permit. Depends on property transfer between cliffs and polymet.

Mpca is planning to send ppp and fs by 3rd week in october. Epa has 45 days to review per email agreement. Jeff is concerned about what epa would send, if we send something. Already bringing up the shortening of the 45 days.

Sum:

Prohibit violation of wqs

Wet limits

Reopener

Additional parameters operating limits

Specify on when mod needs to come in.

401 cert - following same schedule - target of 3rd week in october.

Adm provisions - intent is to get permittee to adjust as they go along to prevent violations

Construction stormwater. Has the narrative limit but no monitoring. Question is when does 401 cert monitoring start. Or do swp's include monitoring.

Mpca will look into swp review, potential monitoring under the swm and/or the 401 cert.

